April 6, 2016

TO: Gold Coast Transit District Board of Directors

From: Steve L. Rosenberg
Director of Finance and Administration

RE: Receive and File Report on the Preliminary Findings from the Federal Transit Administration (FTA) Triennial Review

I. EXECUTIVE SUMMARY

GCTD had its 2016 FTA Triennial Review on March 8-9, 2016. Of the seventeen areas examined, fourteen were found to have no deficiencies and the remaining three areas each received one finding for which the proposed corrective action is straightforward and achievable. The contractor hired by FTA to perform the Review was Calyptus Consulting Group, from Cambridge, MA. In our closing conference, Calyptus’ lead reviewer complemented GCTD by pointing out that GCTD received a fewer-than-average number of findings and saying that GCTD was “a very well-run and very well-managed organization.”

GCTD was notified of its findings during the closing conference on March 9, 2016 and is expecting to receive its draft report soon. GCTD will have ten days from receipt to respond with comments, after which FTA will issue GCTD a final report. Deadlines to submit corrective actions start from the day our final report is received.

For background, every three years transit agencies that receive Urbanized Area Formula Program funds from the Federal Transit Administration (FTA) receive a Triennial Review. FTA’s website says that “the Triennial Review is one of FTA’s management tools for examining grantee performance and adherence to current FTA requirements and policies…it examines how recipients…meet statutory and administrative requirements. The review currently examines seventeen (17) areas. In addition to helping evaluate grantees, the review gives FTA an opportunity to provide technical assistance on FTA requirements.”

GCTD also received an Enhanced Review Module (ERM), a more in-depth review of a particular area. GCTD’s ERM was in the area of Technical Capacity; according to FTA it was initiated based on the size and complexity of the upcoming New Administration and Operations Facility project.
The compliance areas in which no deficiencies were identified are:


GCTD received the following findings:

1. ADA - The grantee must modify its public materials to clearly distinguish ADA complementary paratransit service and any other type of demand-response service. The grantee must monitor ADA and non-ADA paratransit service separately for patterns or practices of capacity constraints.

Despite the finding, Calyptus' lead reviewer was highly complementary of GCTD’s Paratransit program, saying we had “fabulous oversight of your operating contractor.” GCTD has already provided its proposed corrective action to Calyptus and the FTA, and has requested the item be closed.

2. Procurement - The grantee must provide to the FTA regional office revised procurement procedures and checklists that ensure full and open competition in all procurement transactions, including System for Award Management (SAM.gov) check, exercising options, independent cost estimate and market analysis for piggybacking. The grantee must submit evidence of training on the new procedures. For the next procurement, submit documentation that the revised procedures were implemented. (90 days to correct)

Again, the reviewer was generally complementary of our overall Procurement program. These finding came from a review of nine voluminous procurement files and were the result of a small number of missing documents; in most instances we can show the proper actions were actually taken. Nonetheless, we accept the findings and will be bringing to the Board a revised Procurement Manual that incorporates all requested changes as well as planned updates.

3. Disadvantaged Business Enterprise (DBE) - The grantee must submit to the FTA RCRO (Regional Civil Rights Officer) an implemented procedure to ensure that future semi-annual uniform reports are submitted on time in the EAMS.

During the three-year reporting period, three semi-annual reports were each submitted a few days late. GCTD takes responsibility for this error. GCTD has already provided its proposed corrective action to Calyptus and the FTA and has requested the item be closed.
II. SUMMARY

Preparing for a Triennial Review is an exhaustive effort for a transit agency. All GCTD departments spent a 40-day response period answering nearly 200 pages of questions and compiling a submittal of dozens of documents. Consistent interdepartmental interaction is required. GCTD received three relatively minor findings and an overall highly complementary observation from our reviewers. This is the direct result of the commitment, energy and expertise of GCTD’s staff in providing complete, substantive and relevant responses, both on the questionnaire and throughout two days of exhaustive face-to-face review meetings. GCTD is justifiably proud of its staff for a job very well done.

III. RECOMMENDATIONS

IT IS RECOMMENDED that the Board receive and file this report on the Preliminary Findings from the Federal Transit Administration (FTA) Triennial Review.

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General Manager’s Concurrence